

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

[Date] 1-18-93
RECEIVED
JAN 21 1993

RECEIVED
JAN 21 1993

Dear Sirs:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC - MAIL ROOM

I am a hobby retailer who sells many radios, radio-controlled models, and related products in my store. In addition, I sell train products, plastic model kits and other related hobby products.

It has recently come to my attention that the Federal Communications Commission (FCC) is considering an action that has the potential to destroy my business and that of thousands of other retailers nationwide like me. The proceeding is PR Docket 92-235.

Your Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of your rules with a new Part 88. Part 90 allows for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on 72 MHz band and 10 of the 30 frequencies on 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

If adopted the new rule will greatly reduce the usability of frequencies currently assigned for R/C model use and increase the risk of accidents and attendant liability. It will create a significant safety risk and severely damage a billion dollar industry. Loss of R/C sales will hamper my ability to stay in business to sell other hobby items as well.

I urge you to reconsider this action. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz frequencies available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,

ABC HOBBIES
Thomas D. Lusher
1607 LOSEY BLVD. South
LACROSSE W.I. 54601

No. of Copies rec'd 8
List A B C D E

(904) 684-2517
TELEPHONE ~~684-2517~~

DOCKET FILE COPY ORIGINAL



RECEIVED

JAN 21 1993 R/C EQUIPMENT

FCC - MAIL ROOM

FIELDS HOBBY SHOP, INC.

Specializing In Model Planes, Boats and Trains

RECEIVED F.O. Box 1063
Interlachen, FL 32148
Jan. 20, 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC
1919 M St. NW
Washington, DC 20554

* Proposed Rule Making: PR Docket 92-235

Dear Sir:

I am retired as a model hobby shop owner and I now spend my days building and flying radio control model airplanes. I am very active as a fellow modeler in a Club which operates and flies on an abandoned runway at a city owned airport. If this new ruling were passed, it could become extremely dangerous to fly our models on the present frequencies assigned for model use. Our radio frequencies are in the 72-76 MHz band. However, they are far enough apart from land mobile frequencies that we have been able to share without interfering with one another.

I fly 13 different radios and many of my planes are 'Giant Scale' with wing spans 9' and weigh as much as 25-35 lb. I often fly

at organized events and contests. This could prove dangerous if PR Docket 92-235 is adopted.

Please consider my letter as one of protest against approving this proceeding. I am a modeler, a contest director, also, the frequency coordinator for District 5 of the Academy of Model Aeronautics.

Sincerely,

Burnis R. Fields, Jr.

No. of Copies rec'd 0
List A B C D E

DOCKET FILE COPY ORIGINAL

RECEIVED

RECEIVED

JAN 21 1993

January 16, 1993

JAN 21 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal Communications Commission
1919 M Street, NW
Washington, DC

FCC - MAIL ROOM

I am a member of a club whose members enjoy building and flying radio controlled model airplanes. I am very active in this organization, which has over two hundred members, and I contribute much of my time as the editor of the club's newsletter. I have been active in this hobby since childhood and have thousands of dollars invested in model airplanes and radios. Over the years I have enjoyed countless hours of enjoyment pursuing this hobby and made friends with other RC pilots as far away as Hong Kong and Russia.

I am very concerned about proposed rules which are currently under consideration by the Federal Communications Commission; PR Docket 92-235. If adopted these rules will reduce the usability of the frequencies currently assigned for model use and significantly increase the risk of accidents.

Our model radio frequencies are in the 72-76 MHz band which is shared with private land mobile dispatch operators. Presently the assigned frequencies are separated far enough to allow us sharing this band without interfering with one another, but the proposal to insert many additional frequencies between those already existing will make interference inevitable.

While interference between land mobile frequencies is merely a nuisance, interference between a land mobile frequency and a model radio control frequency carries the risk of serious personal injury and death.

Our flying field, which is located in a city park is accessible to the general public and is surrounded by grounds used for sport events such as cross country running and horse riding. We frequently promote special events at our field which are intended to attract the general public and we give public flying demonstrations. When we fly our radio controlled model airplanes we go to great lengths to assure the safety of the pilots and the public. Safety rules are posted at the field and strictly adhered to, such is our constant concern about safety.

I personally fly model airplanes with wingspans of up to 84 inches which reach airspeeds approaching one hundred miles per hour and therefore are potentially capable of causing very serious injury if I were to lose control of the model due to radio interference.

My concern about safety may be further illustrated by the fact that I volunteered to be the Safety Coordinator for the company where I am employed and I have been professionally trained and have trained others in the prevention of industrial accidents. In my opinion the proposed FCC rules create a very serious unsafe condition which can not be allowed. Since these additional frequencies are intended for mobile use we would never

No. of Copies rec'd 2
List A B C D E

know when and where interference might occur, creating an especially insidious situation. I personally could not in good faith fly my model airplanes in such an environment.

I think it is not right for the FCC to propose improving the conditions for land mobile radio users at the expense of the hundreds of thousands of radio control modelers all over the country.

Please help me to continue the safe enjoyment of my hobby by rescinding the proposal for the 72-76 MHz frequency band in its present form.

Sincerely,

A handwritten signature in cursive script, reading "Gerard S. Bakker". The signature is fluid and stylized, with the first name being the most prominent.

Gerard S. Bakker
7630 Farmington Way
Madison, WI 53717

DOCKET FILE COPY ORIGINAL
RECEIVED

JAN 21 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

18900 Pasadero Dr
Tarzana, CA 91356
January 10, 1993

RECEIVED

JAN 21 1993

FCC - MAIL ROOM

Federal Communications Commission
1919 M St, NW
Washington, DC 20554

Gentlemen:

I am informed that a new radio frequency rule proposal is afoot (NPRM - PR Docket 92-235) that would practically destroy the sport of radio control model airplane flying. This proposal would insert many new frequencies between and only 2.5 kHz away from the individual radio control channels we now use (72 and 75 MHz). These signals would have many times the power we use and would be mobile-based, so they will frequently overpower the weak radio signal controlling the airplane, causing wild maneuvers and an out-of-control crash. We could be "shot down" by radio interference at any time, without warning.

To understand how serious this is, you must realize that radio control model airplanes today are not the stick and tissue paper toys of our own childhood days. Many of them are now built of fiberglass, carbon epoxy, and other space age composites like those used in the "Stealth" bombers and fighters. They are heavy and fast flying, and can be dangerous. Such crashes on a frequent basis would be a danger to lives and property, because some of the models are heavy and fly very fast. This would surely result from insertion of these new frequencies.

The models can also be very expensive, with finished models selling for ~\$500-\$1000 and up; but most are built by individual craftsmen spending a few hundred dollars for materials plus hours of skilled labor that would be worth many thousands if done for pay. The crash of such a model is a personal catastrophe. It would probably destroy the sport.

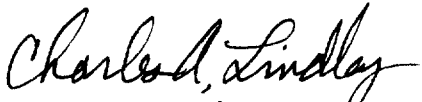
The sport has a great educational impact on the younger generation. The hobbyists of my generation became the aerospace engineers, the pilots, and the skilled mechanics and craftsmen that won the Cold War. I personally would probably not have gotten my CalTech doctorate and spent forty years in the business but for my discovery of this sport in the 1930's. Most of my colleagues came from the same source. A representative of the next generation of model builders is Burt Rutan, who used composite materials experience from models to design the Voyager ("around the world on one tank of gas"), and now builds the Pegasus space booster and various classified vehicles for the military. Where will the next generation come from, if we destroy the sport?

The economic impact of destroying the sport will also be severe.

No. of Copies rec'd 8
List A B C D E

The organized members (Academy of Model Aeronautics) are a few hundred thousand, but there are several times that number who aren't members, and will find out too late to speak. There is a large industry, much of it "cottage industry", that supplies these hobbyists with highly specialized supplies and equipment. A number of individuals I know have recently found this a route out of the shrinking Aerospace industry.

Please see that this plan to destroy our frequency use is not implemented. The impact will be much more than just interference between adjoining communication channels. There will be injury, property damage, and a long-term injury to the educational and aerospace infrastructure.


Charles A. Lindley, Ph D

cc:

The Honorable Barbara Boxer

The Honorable Dianne Feinstein

The Honorable Anthony Beilenson

RECEIVED

JAN 21 1993 DOCKET FILE COPY ORIGINAL

FCC - MAIL ROOM

RECEIVED

JAN 21 1993

January 15, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal Communications Commission
1919 M Street NW
Washington D.C. 20554

Ref.: Proposal NPRM-PR-Docket 92-235

Gentlemen;

I am President of the San Diego County Association of Model Clubs representing more than 3000 members of the affiliated clubs in the County.

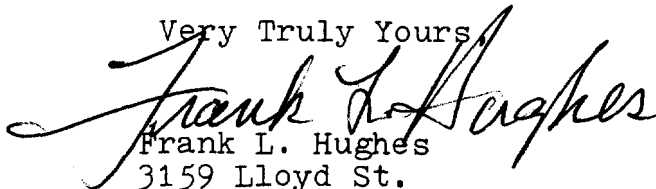
Nearly all of our members fly radio controlled model aircraft.

I am writing to you to object to the implementation of the ref. proposal where it adversely affects the operation of model aircraft.

At the present time our new, narrow band receivers will adequately screen out a 10 kHz spread but putting two more users only 2.5 kHz away will result in the destruction of models, degrade our safety record which has been exemplary, and cause substantial economic hardship on the modeling community.

I urge you to reconsider going forward with this proposal which will do so much harm to the almost 200,000 citizens of all ages who enjoy this hobby.

Very Truly Yours



Frank L. Hughes
3159 Lloyd St.
San Diego, Ca. 92117
A/C 619 273-2796

No. of Copies rec'd _____
List A B C D E

Richard C. McCaskill

COMMUNICATIONS CONSULTING
RECEIVED

JAN 21 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECEIVED

JAN 21 1993

FCC - MAIL ROOM

FCC
1919 M St. NW
Washington, D.C. 20554

Dear Sir,

It has come to my attention that the FCC is considering a change in the frequency allocation for private usage. The Proposed Rule Marking is **NPRM PR Docket 92-2135**.

I am writing to you requesting your support in the defeat of this proposal. I am an RC Modeler that fly radio control airplanes. The reason I am requesting your support is that the proposed change will insert new frequencies very close to the current frequencies that the RC Model industry presently use. The new frequencies will also have higher power than the RC Model frequencies and the frequency will be modulated, thus the chances that the new frequencies will interfere with the RC Model frequencies is high.

You may ask why the concern, first of all if we are flying a radio controlled powered airplane and if someone with the new frequency channel radio is near by, the model will be uncontrollable due to radio interference. This most likely will cause the plane to crash. The RC models we fly are not toys, with most planes having a powered engine fly at speeds of 50 to 150 mph. An object that is not under control at those speeds hitting a person would have a good chance of killing a person, if hit, or causing serious injury. Second, the cost of most of our planes are from \$500 to \$3000. Lastly, there are over 3 million RC pilots in the United States that would be effected by this new rule change.

I would appreciate your support in the defeat of this proposed rule change by the FCC.

Sincerely,



Richard C. McCaskill

No. of Copies rec'd _____
List A B C D E

DOCKET FILE COPY ORIGINAL

RECEIVED

RECEIVED

Federal Communications Commission
1919 M Street NW
Washington, DC 20554

JAN 21 1993

JAN 21 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC - MAIL ROOM

Urgent: Serious problem with PR Docket 92-235.

Dear Sirs:

Please help me! My hobby is the construction and operation of radio controlled model airplanes. I have been in this hobby for many years and have a considerable investment in it. It is a wonderful hobby for young and old. Also, I have many friends in this hobby.

I am very concerned about the proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is **PR Docket 92-235**. If adopted, the new rules will absolutely cause radio interference on the majority of frequencies currently assigned for RC model aircraft use. Safety is very important in this hobby.

Our RC frequencies are in the 72 - 76 MHz band. We share this band with the private land mobile dispatch operations. However, now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging this band. The mobile frequencies will be separated by 5 KHz but they will bracket the RC frequencies by only 2.5 KHz. This will cause interference on the RC channels. In addition **the technical specifications for the new mobile equipment allows a frequency tolerance which could place their signal directly on an RC channel.**

Can you imagine all the RC airplanes, each costing several hundred dollars or more, that will be crashing to the ground because someone uses a "mobile" telephone in the vicinity. We modelers have controls and rules in place to assure the safety of the operators and bystanders and also the protection of surrounding property. But there will be no protection against these new frequencies because they are "mobile" and we would never know where they are.

The frequency changes are proposed by the FCC Land Mobile Service. The FCC has issued a Notice of Proposed Rule Making (**NPRM - PR Docket 92-235**)

All over the country there are organized events and contests where hundreds of operators participate. Spectators often number in the thousands at these events. This hobby provides many hours of enjoyment to hundreds of thousands of people like myself and my family. *Please help keep model aviation safe.*

The FCC must not be allowed to carry out its proposals for the 72 - 76 MHz band.

Sincerely



No. of Copies rec'd _____
List A B C D E _____

2

RECEIVED

JAN 21 1993

RECEIVED

JAN 21 1993

DOCKET FILE COPY ORIGINAL

January 19, 1993

FCC

1919 M. Street

Washington, D.C. 29554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC - MAIL ROOM

Dear Sirs:

I am the Vice President of the Racine Wisconsin Radio Control Club, and I derive many hours of enjoyment from constructing and operating radio controlled model airplanes, as do our 110 members.

I am very concerned about proposed rules that are currently under consideration by you, the FCC. The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability and increase the risk of accidents and attendant liability for controlling model airplanes under the frequencies now assigned.

You, the FCC, want to create more land mobile frequencies by splitting bandwidths and rearranging the band plan. This will result in many land mobile frequencies moving closer to frequencies that we now use and cause interference to radio control operations. Of the 50 frequencies that we are currently assigned, only 19 will remain if this is adopted.

When we fly radio controlled airplanes, the utmost care is taken to promote safety of the operators, bystanders, and property. If the number of usable frequencies is diminished as you propose, the remaining frequencies will become congested and reduce the margin of safety.

I do not think it wise to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. We have a considerable investment in our models and radio equipment. The hobby provides many hours of safe enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not carrying out your proposal for the 72-76 MHz band.

Sincerely,



JERRY W. ARMANTROUT
Vice President
Racine R/C Club

No. of Copies rec'd 0
List ABCDE